

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

*In re Family Dollar Stores, Inc., Pest
Infestation Litigation*

This Document Relates To:

ALL CASES

MDL No. 3032

Case No. 2:22-md-03032-SHL-TMP

DECLARATION OF RYAN CHUMLEY OF ANGEION GROUP, LLC
RE: SETTLEMENT ADMINISTRATION

I, Ryan Chumley, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a Senior Project Manager at the class action notice and settlement administration firm Angeion Group, LLC (“Angeion”), with headquarters located at 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. I am over 21 years of age and am not party to this action. I have personal knowledge of the facts set forth herein.

2. On February 8, 2024, Angeion reported that it had “received a total of 945,764 Claim Form submissions (945,467 online submissions and 297 submissions by mail). While all Claim Form submissions are *subject to final audits and review*, Angeion’s real-time fraud detection system, AngeionAffirm, has identified approximately 752,643 Claim Form submissions as potentially fraudulent.” Dkt. 199 (Weisbrot Decl. ¶19).

3. On March 1, 2024, Angeion provided updated figures to the parties, which I understand they reported in Defendant’s Statement in Support of Plaintiffs’ Motion for Final Approval of Settlement. *See* Dkt. 205. In this filing, the parties reported 136,980 validated claims, but they noted that these totals would be subject to a final audit by Angeion.

4. Angeion has now completed its audit, and the purpose of this supplemental declaration is to provide the parties and the Court with the results of the final claim audits and review, including final totals.

Declaration of Ryan Chumley re: Settlement Administration

5. The 752,643 Claim Form submissions identified as potentially fraudulent have been confirmed as fraud based on the fraud criteria previously described. *See* Dkt. 199 (Weisbrot Decl. ¶ 20).

6. The remaining 193,121 Claim Forms that were not initially identified as potentially fraudulent, were then reviewed for (1) Validity, *i.e.*, review of the store that was provided on the Claim Form, the state of the claimant's residence, and other requirements of the Settlement; (2) Completeness, *i.e.*, confirming all required fields were completed on the Claim Form and confirming that mailed Claim Forms were signed; and (3) Whether the Claim Form was duplicative of another Claim Form submission.

7. As a result of these review efforts, 136,980 Claim Forms were determined to be non-duplicative and were submitted by an individual who resided within an eligible state and who selected a Family Dollar store within an eligible state.¹

8. It is important to note that AngeionAffirm is a real-time fraud detection with distinct proprietary methods of identifying indicia of fraud at the time a Claim Form is submitted, which is distinct from the final fraud review performed at the end of claim review process. Angeion performed this final fraud review in the last month, since the parties' report on March 1 (*see* Dkt. 205).

9. Angeion is constantly monitoring and identifying new and different techniques used by bad actors who attempt to perpetuate fraud. As such, while Angeion's fraudulent detection efforts are continuously being refined, they remain fluid and adaptable to match the sophisticated and ever-evolving fraud landscape.

10. Angeion's final fraud audits and review of the 136,980 Claim Forms includes an audit of the claim data to identify fraudulent activity that, when viewed individually may not be

¹ Angeion conferred with the Parties to confirm that claims where the claimant resided within an eligible state and selected a store within an eligible state were acceptable.

suspicious, but is indicative of fraud when reviewed in conjunction with other Claim Form submissions. This process involves a programmatic review of Claim Form data to identify and flag records that have indicia of fraud, such as suspicious email address domains, invalid email address domains, claims that were not programmatically removed as duplicative but require additional review, and claim submissions originating from foreign IP addresses. Once the records are flagged, our team performs a manual review to confirm or dismiss the potential fraud indicator.

11. Angeion's final fraud audit process identified 68,941 fraudulent submissions out of the 136,980 non-duplicative Claim Forms reviewed. Claim Forms were identified as fraud for one or more of the following reasons(s)²:

- Invalid email address domains (35,670);
- Suspicious email domains associated with known attempted fraud (28,089);
- Mass claim form submissions by one individual using slight variations of name and address (1,569); and
- Multiple claim form submissions originating from a foreign IP address (3,613).

12. As a result of the final audits and review of the 193,121 Claim Forms (described in paragraph 6 herein), a total of **68,039** Claim Forms were validated as Approved Claims and 125,082 Claim Forms were rejected, for reasons identified in the chart below:

Determination	Count
Approved Claims	68,039
Invalid (Class Member Residence – Ineligible State)	26,576
Invalid (Store Selected Outside of Eligible States)	13,180
Invalid (No Identifiable Store Information Provided)	6,988
Duplicative of Another Claim Form Submission	9,397
Fraud (Final Fraud Audits)	68,941
Fraud (Identified by AngeionAffirm)	752,643
Total	945,764

² A count is provided for claims identified as potentially fraudulent for each reason. Claims may have been fraudulent for multiple reasons so only the primary reason is counted in the table above.

13. The 68,039 Approved Claims represent an approximate 6.47% claim filing rate and have a total gift card value of \$1,700,975. In Angeion's experience, this claims rate is consistent with what we have seen for other similar claims-made consumer settlements.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: April 1, 2024


Ryan Chumley

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2024, I electronically filed the above with the Clerk of this Court by using the CM/ECF system, which will accomplish service through the Notice of Electronic Filing for parties and attorneys who are Filing Users.

/s/ Christopher Chorba
Christopher Chorba